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## **FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY**

**Blocksom & Company  
405 East 5<sup>th</sup> Street  
Michigan City, Indiana 46360**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 091-14808-00059	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: November 4, 2002  Expiration Date: November 4, 2007

## TABLE OF CONTENTS

### SECTION A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-8-3(b)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]
- A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]
- A.4 FESOP Applicability [326 IAC 2-8-2]
- A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

### SECTION B GENERAL CONDITIONS

- B.1 Permit No Defense [IC 13]
- B.2 Definitions [326 IAC 2-8-1]
- B.3 Permit Term [326 IAC 2-8-4(2)]
- B.4 Enforceability [326 IAC 2-8-6]
- B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]
- B.6 Severability [326 IAC 2-8-4(4)]
- B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]
- B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]  
[326 IAC 2-8-5 (a)(4)]
- B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]
- B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]
- B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]
- B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]
- B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]
- B.14 Emergency Provisions [326 IAC 2-8-12]
- B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]
- B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]
- B.17 Permit Renewal [326 IAC 2-8-3(h)]
- B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]
- B.19 Operational Flexibility [326 IAC 2-8-15]
- B.20 Permit Revision Requirement [326 IAC 2-8-11.1]
- B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]
- B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]
- B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

### SECTION C SOURCE OPERATION CONDITIONS

#### Emission Limitations and Standards [326 IAC 2-8-4(1)]

- C.1 Overall Source Limit [326 IAC 2-8] [326 IAC 2-2]
- C.2 Opacity [326 IAC 5-1]
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
- C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]
- C.7 Stack Height [326 IAC 1-7]
- C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61 Subpart M]

#### Testing Requirements [326 IAC 2-8-4(3)]

- C.9 Performance Testing [326 IAC 3-6]

**Compliance Requirements [326 IAC 2-1.1-11]**

- C.10 Compliance Requirements [326 IAC 2-1.1-11]
- C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

- C.12 Monitoring Methods [326 IAC 3] [40 CFR 60][40 CFR 63]
- C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

**Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

- C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]
- C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4, 5]
- C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4, 5]

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

- C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]
- C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

**Stratospheric Ozone Protection**

- C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

**SECTION D.1 FACILITY OPERATION CONDITIONS: Surface Coating Operations**

**Emission Limitations and Standards [326 IAC 2-8-4(1)]**

- D.1.1 Hazardous Air Pollutants (HAPs) Limitations [326 IAC 2-8-4]
- D.1.2 PM and PM<sub>10</sub> Emissions [326 IAC 2-8-4] [326 IAC 2-2]
- D.1.3 Particulate Matter (PM) [40 CFR 52 Subpart P]
- D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

**Compliance Determination Requirements**

- D.1.5 Hazardous Air Pollutants (HAPs)
- D.1.6 Hazardous Air Pollutants (HAPs) Emissions

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

- D.1.7 Particulate [326 IAC 6-3-2(d)]

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

- D.1.8 Record Keeping Requirements
- D.1.9 Reporting Requirements

**SECTION D.2 FACILITY OPERATION CONDITIONS: Baghouse BH-1 Operations**

**Emission Limitations and Standards [326 IAC 2-8-4(1)]**

- D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]
- D.2.2 PM<sub>10</sub> Emissions [326 IAC 2-8-4]
- D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

**Compliance Determination Requirements**

- D.2.4 Particulate Matter (PM)
- D.2.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

- D.2.6 Visible Emissions Notations
- D.2.7 Parametric Monitoring
- D.2.8 Baghouse Inspections
- D.2.9 Broken or Failed Bag Detection

**Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

- D.2.10 Record Keeping Requirements

**SECTION D.3 FACILITY OPERATION CONDITIONS: Insignificant Activities**

**Emission Limitations and Standards [326 IAC 2-8-4(1)]**

- D.3.1 Particulate Matter (PM) [40 CFR 52 Subpart P]

**Certification**

**Emergency Occurrence Report**

**Quarterly Reports**

**Quarterly Deviation and Compliance Monitoring Report**

## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

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The Permittee owns and operates a stationary filter manufacturing source.

Authorized Individual:	Director of Manufacturing
Source Address:	405 East 5 <sup>th</sup> Street, Michigan City, Indiana 46360
Mailing Address:	P.O. Box 2007, Michigan City, Indiana 46360
General Source Phone Number:	219 - 878 - 4458
SIC Code:	2299
County Location:	LaPorte
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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This stationary source consists of the following emission units and pollution control devices:

#### Paratex Process

- (a) Three (3) spray booths, known as Spray Booth #1 (topcoat), #2 (bottomcoat) and #3 (second topcoat), installed in 1955, each equipped with one (1) airless spray gun with two (2) tips and overspray pans, exhausting through Vents 1, 2 and 3, capacity: 1.3 gallons of latex per minute, per tip, or 7.8 gallons of latex per minute, total or 468 gallons of latex per hour total.

#### Molding Process

- (b) One (1) hand-dip painting operation (wet picker area), consisting of a small latex paint tank and a mixer, installed in 1930, capacity: 200 pounds of hog hair fibers per hour.
- (c) One (1) respray area, equipped with a hand-held spray gun with one (1) tip and overspray pans, exhausting through Vent 1, installed in 1930, capacity: 1.3 gallons of latex per minute.

#### Paratex Process

- (d) Four (4) feeders, known as feeders #1 through #4, equipped with a baghouse, known as BH-1, exhausted through Stack BH-1, installed in 1979, capacity: 1,000 pounds of hog hair per hour, each.
- (e) One (1) bale opener, equipped with a baghouse, known as BH-1, exhausted through Stack BH-1, installed 1955, identical replacement in 2000, capacity: 3,300 pounds of hog hair per hour.

- (f) One (1) wigwag blending machine, equipped with a baghouse, known as BH-1, exhausted through Stack BH-1, installed in 1955, capacity: 3,000 pounds of hog hair fibers per hour.
- (g) One (1) lickerin assembly, equipped with a baghouse, known as BH-1, exhausted through Stack BH-1, installed in 1955, capacity: 3,000 pounds of hog hair fibers per hour.

**A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]**

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour with a total rating of 12.23225 million British thermal units per hour consisting of:

**Paratex Process**

- (1) Oven #1, rated at 3.30 million British thermal units per hour, exhausting through Stack 1.
- (2) Oven #2, rated at 1.50 million British thermal units per hour, exhausting through Stack 2

**Molding Process**

- (3) One (1) mold dryer #1, rated at 1.50 million British thermal units per hour, exhausting through Stack 3.
- (4) Two (2) back-up mold dryers #2 and #3, rated at 1.50 million British thermal units per hour, each.
- (5) One (1) drying oven #3, rated at 2.025 million British thermal units per hour, exhausting through Stack 4.

**Space Heaters**

- (6) One (1) Pattern Shop space heater, rated at 0.17325 million British thermal units per hour.
- (7) One (1) Lift Repair Shop space heater, rated at 0.180 million British thermal units per hour.
- (8) One (1) Lab space heater, rated at 0.125 million British thermal units per hour.
- (9) One (1) bathroom/storage space heater, rated at 0.040 million British thermal units per hour.
- (10) Two (2) Maintenance Shop space heaters, rated at 0.080 million British thermal units per hour, each.
- (11) One (1) Take Off space heater, rated at 0.125 million British thermal units per hour.
- (12) One (1) Mold space heater, rated at 0.104 million British thermal units per hour.

- (b) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month consisting of:

One (1) aboveground storage tank, capacity: 500 gallons of diesel fuel.

- (c) Any operation using aqueous solutions containing less than one (1) percent by weight of VOCs excluding HAPs: Hot Melt Process consisting of one (1) hot melt spray booth, equipped with one (1) airless spray gun with one (1) tip, installed in 1991, capacity: 0.12 gallons of adhesive per minute.
- (d) Slitting knives, one (1) splitting head and one (1) shaper (Paratex Process).
- (e) Five (5) latex storage tanks, installed prior to 1970, capacity: 5,000 gallons each.
- (f) One (1) latex mixer tank, installed prior to 1970, capacity: 400 gallons.
- (g) Four (4) staging tanks, three (3) tanks installed prior to 1970 and one (1) tank installed in 1998, capacity: 1,200 gallons each.
- (h) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings including:
  - One (1) respray spray booth, equipped with one (1) hand-held pump spray gun with one (1) tip, installed in 1960, capacity: 1.3 gallons of oil per minute.
- (i) Three (3) rope openers, installed in 1955, completely enclosed (no emissions), capacity: 1,000 pounds of ropes per hour each (less than 1 pound per hour each) (326 IAC 6-3-2).
- (j) One (1) rope opener, installed in 1930, completely enclosed (no emissions), capacity: 1,000 pounds of ropes per hour (less than 1 pound per hour) (326 IAC 6-3-2).
- (k) One (1) conveyor belt, equipped with a water mist, installed in 1955, capacity: 3,000 pounds of hog hair fibers per hour (0.1 pounds of PM per hour).
- (l) One (1) scrap grinder, installed in 1992, capacity: 350 pounds of side trim and/or rejected mats per hour (less than 1 pound per hour) (326 IAC 6-3-2)

#### A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

#### A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted

by this permit.

- (b) All previous registrations and permits are superseded by this permit.



## SECTION B

## GENERAL CONDITIONS

### B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

### B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

### B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

### B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

### B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual"

as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]

- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]**

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

**B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]**

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; and
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

**B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]**

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

**B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

**B.14 Emergency Provisions [326 IAC 2-8-12]**

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ / Northwest Regional Office, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section)  
or,

Telephone No.: 317-233-5674 (ask for Compliance Section)  
Facsimile No.: 317-233-5967

Northwest Regional Office: 219-881-6712, facsimile 219-881-6745

Failure to notify IDEM, OAQ / Northwest Regional Office, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]**

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]**

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.17 Permit Renewal [326 IAC 2-8-3(h)]**

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by

the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.



- (c) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

**B.20 Permit Revision Requirement [326 IAC 2-8-11.1]**

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

**B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]**

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source
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### Emissions Limitations and Standards [326 IAC 2-8-4(1)]

#### C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred and fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment is are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

#### **Testing Requirements [326 IAC 2-8-4(3)]**

##### **C.9 Performance Testing [326 IAC 3-6]**

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

#### **Compliance Requirements [326 IAC 2-1.1-11]**

##### **C.10 Compliance Requirements [326 IAC 2-1.1-11]**

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

**C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

**C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]**

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

**Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]**

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4]  
[326 IAC 2-8-5]

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- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
  - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

**C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).



- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

#### **Stratospheric Ozone Protection**

##### **C.19 Compliance with 40 CFR 82 and 326 IAC 22-1**

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]: Surface Coating Operations

#### Paratex Process

- (a) Three (3) spray booths, known as Spray Booth #1 (topcoat), #2 (bottomcoat) and #3 (second topcoat), installed in 1955, each equipped with one (1) airless spray gun with two (2) tips and overspray pans, exhausting through Vents 1, 2 and 3, capacity: 1.3 gallons of latex per minute, per tip, or 7.8 gallons of latex per minute, total or 468 gallons of latex per hour total.

#### Molding Process

- (b) One (1) hand-dip painting operation (wet picker area), consisting of a small latex paint tank and a mixer, installed in 1930, capacity: 200 pounds of hog hair fibers per hour.
- (c) One (1) respray area, equipped with a hand-held spray gun with one (1) tip and overspray pans, exhausting through Vent 1, installed in 1930, capacity: 1.3 gallons of latex per minute.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.1.1 Hazardous Air Pollutants (HAPs) Limitations [326 IAC 2-8-4]

- (a) The worst case single HAP delivered to the coating applicators in the three (3) spray booths, known as Spray Booth #1 (topcoat), #2 (bottomcoat) and #3 (second topcoat), the one (1) hand-dip painting operation and the one (1) respray area shall not exceed a total of 9.90 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 2-7 do not apply.
- (b) The combination of HAPs delivered to the coating applicators in the three (3) spray booths, known as Spray Booth #1 (topcoat), #2 (bottomcoat) and #3 (second topcoat), the one (1) hand-dip painting operation and the one (1) respray area shall not exceed a total of 24.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 2-7 do not apply.

#### D.1.2 PM and PM<sub>10</sub> Emissions [326 IAC 2-8-4] [326 IAC 2-2] [40 CFR 52.21]

The total solids delivered to the applicators of the three (3) spray booths, known as Spray Booth #1 (topcoat), #2 (bottomcoat) and #3 (second topcoat) and the one (1) respray area shall not exceed 8,950 tons per twelve (12) consecutive month period with compliance determined at the end of each month based on a minimum transfer efficiency of ninety percent (90%) and a minimum water pan capture efficiency of ninety percent (90%). This limit is equivalent to PM and PM<sub>10</sub> emissions of less than 89.5 tons per year. The PM<sub>10</sub> limit will satisfy the requirements of 326 IAC 2-8-4. The PM and PM<sub>10</sub> limits retain the source's minor PSD status pursuant to 326 IAC 2-2 and 40 CFR 52.21].

#### D.1.3 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to F 091-6418-00059, issued on May 28, 1997 and 40 CFR 52 Subpart P, the PM from the three (3) spray booths, known as Spray Booth #1 (topcoat), #2 (bottomcoat) and #3 (second topcoat) and the one (1) respray area shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

**D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

**Compliance Determination Requirements**

**D.1.5 Hazardous Air Pollutants (HAPs)**

Compliance with the HAPs usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

**D.1.6 Hazardous Air Pollutants (HAPs) Emissions**

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total single and total combination HAPs usage for the twelve (12) month period.

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**D.1.7 Particulate [326 IAC 6-3-2(d)]**

Pursuant to 326 IAC 6-3-2(d), the surface coating spray operations shall be controlled by a dry particulate filter, waterwash or an equivalent control device, and the control device shall be operated in accordance with manufacturer's specifications.

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

**D.1.8 Record Keeping Requirements**

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits established in Condition D.1.1.
- (1) The amount and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) The cleanup solvent usage for each month;
  - (3) The total single and combination of HAPs usage for each month; and
  - (4) The weight of single and combination HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the solids limit established in Condition D.1.2.

- (1) The amount and solids content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (2) The total solid delivered to the applicators each month; and
  - (3) The weight of PM<sub>10</sub> emitted for each compliance period.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]: Baghouse BH-1 Operations

- (d) Four (4) feeders, known as feeders #1 through #4, equipped with a baghouse, known as BH-1, exhausted through Stack BH-1, installed in 1979, capacity: 1,000 pounds of hog hair per hour, each.
- (e) One (1) bale opener, equipped with a baghouse, known as BH-1, exhausted through Stack BH-1, installed 1955, identical replacement in 2000, capacity: 3,300 pounds of hog hair per hour.
- (f) One (1) wigwag blending machine, equipped with a baghouse, known as BH-1, exhausted through Stack BH-1, installed in 1955, capacity: 3,000 pounds of hog hair fibers per hour.
- (g) One (1) lickerin assembly, equipped with a baghouse, known as BH-1, exhausted through Stack BH-1, installed in 1955, capacity: 3,000 pounds of hog hair fibers per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.2.1 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to F 091-6418-00059, issued on May 28, 1997 and 40 CFR 52 Subpart P, the PM emission rate from the four (4) feeders, one (1) bale opener, one (1) wigwag blending machine, and the one (1) lickerin assembly controlled by baghouse BH-1 shall not exceed 5.73 pounds per hour, total, when operating at a process weight rate of 3,300 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

#### D.2.2 PM<sub>10</sub> Emissions [326 IAC 2-8-4]

The PM<sub>10</sub> emissions from the four (4) feeders, one (1) bale opener, one (1) wigwag blending machine, and the one (1) lickerin assembly controlled by baghouse BH-1 shall not exceed 1.02 pounds per hour. This limit will satisfy the requirements of 326 IAC 2-8-4.

#### D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control device.

### Compliance Determination Requirements

#### D.2.4 Particulate Matter (PM)

In order to comply with Conditions D.2.1 and D.2.2, the baghouse BH-1 for PM and PM<sub>10</sub> control shall be in operation and control emissions from the four (4) feeders, one (1) bale opener, one (1) wigwag blending machine, and the one (1) lickerin assembly at all times that these facilities are in operation.

**D.2.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]**

Within 180 days after issuance of this permit, in order to demonstrate compliance with Conditions D.2.1 and D.2.2, the Permittee shall perform PM and PM<sub>10</sub> testing of the operations controlled by baghouse BH-1 exhaust utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM<sub>10</sub> includes filterable and condensable PM<sub>10</sub>. Testing shall be conducted in accordance with Section C- Performance Testing.

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**D.2.6 Visible Emissions Notations**

- (a) Visible emission notations of the baghouse BH-1 stack exhaust shall be performed during normal daylight operations once per shift. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

**D.2.7 Parametric Monitoring**

The Permittee shall record the total static pressure drop across the baghouse BH-1 used in conjunction with the four (4) feeders, one (1) bale opener, one (1) wigwag blending machine, and the one (1) lickerin assembly, at least once per shift when any of these facilities are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 2.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

**D.2.8 Baghouse Inspections**

An inspection shall be performed within the last month of each calendar quarter of all bags controlling the four (4) feeders, one (1) bale opener, one (1) wigwag blending machine, and the one (1) lickerin assembly. All defective bags shall be replaced.

#### D.2.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

#### **Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

##### D.2.10 Record Keeping Requirements

- (a) To document compliance with Condition D.2.6, the Permittee shall maintain records of visible emission notations of the baghouse BH-1 stack exhaust once per shift.
- (b) To document compliance with Condition D.2.7, the Permittee shall maintain per shift records of the total static pressure drop during normal operation.
- (c) To document compliance with Condition D.2.8, the Permittee shall maintain records of the results of the inspections required under Condition D.2.8.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### SECTION D.3

### FACILITY OPERATION CONDITIONS

#### Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

- (i) Three (3) rope openers, installed in 1955, completely enclosed (no emissions), capacity: 1,000 pounds of ropes per hour each (less than 1 pound per hour each) (326 IAC 6-3-2).
- (j) One (1) rope opener, installed in 1930, completely enclosed (no emissions), capacity: 1,000 pounds of ropes per hour (less than 1 pound per hour) (326 IAC 6-3-2).
- (l) One (1) scrap grinder, installed in 1992, capacity: 350 pounds of side trim and/or rejected mats per hour (less than 1 pound per hour) (326 IAC 6-3-2)

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

#### Emission Limitations and Standards [326 IAC 2-8-4(1)]

##### D.3.1 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to F 091-6418-00059, issued on May 28, 1997 and 40 CFR 52 Subpart P, the particulate matter (PM) from the rope openers and scrap grinder shall not exceed 2.58 and 1.28 pounds per hour for process weight rates of 1,000 pounds per hour each for each rope opener and 350 pounds per hour for the scrap grinder. The allowable PM emission rates were calculated by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and  
P = process weight rate in tons per hour

#### Compliance Determination Requirements

There are no specific Compliance Determination Requirements applicable to these emission units.

#### Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

There are no specific Compliance Monitoring Requirements applicable to these emission units.



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Blocksom & Company  
Source Address: 405 East 5<sup>th</sup> Street, Michigan City, Indiana 46360  
Mailing Address: P.O. Box 2007, Michigan City, Indiana 46360  
FESOP No.: F 091-14808-00059

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Affidavit (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Blocksom & Company  
Source Address: 405 East 5<sup>th</sup> Street, Michigan City, Indiana 46360  
Mailing Address: P.O. Box 2007, Michigan City, Indiana 46360  
FESOP No.: F 091-14808-00059

**This form consists of 2 pages**

**Page 1 of 2**

**9** This is an emergency as defined in 326 IAC 2-7-1(12)  
CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and  
CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: Blocksom & Company  
Source Address: 405 East 5<sup>th</sup> Street, Michigan City, Indiana 46360  
Mailing Address: P.O. Box 2007, Michigan City, Indiana 46360  
FESOP No.: F 091-14808-00059  
Facilities: Three (3) spray booths, known as Spray Booth #1 (topcoat), #2 (bottomcoat) and #3 (second topcoat) and the one (1) respray area  
Parameter: Single HAP  
Limit: A total of 9.9 tons of any single HAP per twelve (12) consecutive month period.

YEAR: \_\_\_\_\_

Month	Single HAP (tons)	Single HAP (tons)	Single HAP (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: Blocksom & Company  
Source Address: 405 East 5<sup>th</sup> Street, Michigan City, Indiana 46360  
Mailing Address: P.O. Box 2007, Michigan City, Indiana 46360  
FESOP No.: F 091-14808-00059  
Facilities: Three (3) spray booths, known as Spray Booth #1 (topcoat), #2 (bottomcoat) and #3 (second topcoat) and the one (1) respray area  
Parameter: Combination of HAPs  
Limit: A total of 24.9 tons of the combination of HAPs per twelve (12) consecutive month period.

YEAR: \_\_\_\_\_

Month	Combination of HAPs (tons)	Combination of HAPs (tons)	Combination of HAPs (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: Blocksom & Company  
Source Address: 405 East 5<sup>th</sup> Street, Michigan City, Indiana 46360  
Mailing Address: P.O. Box 2007, Michigan City, Indiana 46360  
FESOP No.: F 091-14808-00059  
Facilities: Three (3) spray booths, known as Spray Booth #1 (topcoat), #2 (bottomcoat) and #3 (second topcoat) and the one (1) respray area  
Parameter: Solids Applied to Applicators  
Limit: Total of 8,950 tons per twelve (12) consecutive month period with a minimum transfer efficiency of ninety percent (90%) and a minimum water pan capture efficiency of ninety percent (90%).

YEAR: \_\_\_\_\_

Month	Total Solids Applied (tons)	Total Solids Applied (tons)	Total Solids Applied (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Blocksom & Company  
Source Address: 405 East 5<sup>th</sup> Street, Michigan City, Indiana 46360  
Mailing Address: P.O. Box 2007, Michigan City, Indiana 46360  
FESOP No.: F 091-14808-00059

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

9      No deviation occurred in this quarter.

9      Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.



Indiana Department of Environmental Management  
Office of Air Quality

Technical Support Document (TSD)  
for a Federally Enforceable State Operating Permit (FESOP) Renewal

**Source Background and Description**

<b>Source Name:</b>	<b>Blocksom &amp; Company</b>
<b>Source Location:</b>	<b>405 East 5<sup>th</sup> Street, Michigan City, Indiana 46360</b>
<b>County:</b>	<b>LaPorte</b>
<b>SIC Code:</b>	<b>2299</b>
<b>Operation Permit No.:</b>	<b>F 091-14808-00059</b>
<b>Permit Reviewer:</b>	<b>Frank P. Castelli</b>

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Blocksom & Company relating to the operation of a stationary filter manufacturing source. Blocksom & Company was issued FESOP 091-6418-00059 on May 28, 1997.

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

**Paratex Process**

- (a) Three (3) spray booths, known as Spray Booth #1 (topcoat), #2 (bottomcoat) and #3 (second topcoat), installed in 1955, each equipped with one (1) airless spray gun with two (2) tips and overspray pans, exhausting through Vents 1, 2 and 3, capacity: 1.3 gallons of latex per minute, per tip, or 7.8 gallons of latex per minute, total or 468 gallons of latex per hour total.
- (b) Four (4) feeders, known as feeders #1 through #4, equipped with a baghouse, known as BH-1, exhausted through Stack BH-1, installed in 1979, capacity: 1,000 pounds of hog hair per hour, each.
- (c) One (1) bale opener, equipped with a baghouse, known as BH-1, exhausted through Stack BH-1, installed 1955, identical replacement in 2000, capacity: 3,300 pounds of hog hair per hour.
- (d) One (1) wigwag blending machine, equipped with a baghouse, known as BH-1, exhausted through Stack BH-1, installed in 1955, capacity: 3,000 pounds of hog hair fibers per hour.
- (e) One (1) lickerin assembly, equipped with a baghouse, known as BH-1, exhausted through Stack BH-1, installed in 1955, capacity: 3,000 pounds of hog hair fibers per hour.

**Molding Process**

- (f) One (1) hand-dip painting operation (wet picker area), consisting of a small latex paint tank and a mixer, installed in 1930, capacity: 200 pounds of hog hair fibers per hour.

- (g) One (1) respray area, equipped with a hand-held spray gun with one (1) tip and overspray pans, exhausting through Vent 1, installed in 1930, capacity: 1.3 gallons of latex per minute.

#### **Emission Units Disconnected and Locked-out of Service**

The source consists of the following permitted emission units and pollution control devices that have been taken out of service:

- (h) One (1) Eisenhower blender, installed in 1930, capacity: 1,200 pounds of fibers per hour.

#### **Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted facilities operating at this source during this review process.

#### **New Emission Units and Pollution Control Equipment Receiving New Source Review Approval**

There are no new facilities proposed at this source during this review process.

#### **Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour with a total rating of 12.23225 million British thermal units per hour consisting of:

##### **Paratex Process**

- (1) Oven #1, rated at 3.30 million British thermal units per hour, exhausting through Stack 1.
- (2) Oven #2, rated at 1.50 million British thermal units per hour, exhausting through Stack 2

##### **Molding Process**

- (3) One (1) mold dryer #1, rated at 1.50 million British thermal units per hour, exhausting through Stack 3.
- (4) Two (2) back-up mold dryers #2 and #3, rated at 1.50 million British thermal units per hour, each.
- (5) One (1) drying oven #3, rated at 2.025 million British thermal units per hour, exhausting through Stack 4.

##### **Space Heaters**

- (6) One (1) Pattern Shop space heater, rated at 0.17325 million British thermal units per hour.
- (7) One (1) Lift Repair Shop space heater, rated at 0.180 million British thermal units per hour.

- (8) One (1) Lab space heater, rated at 0.125 million British thermal units per hour.
- (9) One (1) bathroom/storage space heater, rated at 0.040 million British thermal units per hour.
- (10) Two (2) Maintenance Shop space heaters, rated at 0.080 million British thermal units per hour, each.
- (11) One (1) Take Off space heater, rated at 0.125 million British thermal units per hour.
- (12) One (1) Mold space heater, rated at 0.104 million British thermal units per hour.
- (b) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month consisting of:
  - One (1) aboveground storage tank, capacity: 500 gallons of diesel fuel.
- (c) Any operation using aqueous solutions containing less than one (1) percent by weight of VOCs excluding HAPs: Hot Melt Process consisting of one (1) hot melt spray booth, equipped with one (1) airless spray gun with one (1) tip, installed in 1991, capacity: 0.12 gallons of adhesive per minute.
- (d) Slitting knives, one (1) splitting head and one (1) shaper (Paratex Process).
- (e) Five (5) latex storage tanks, installed prior to 1970, capacity: 5,000 gallons each.
- (f) One (1) latex mixer tank, installed prior to 1970, capacity: 400 gallons.
- (g) Four (4) staging tanks, three (3) tanks installed prior to 1970 and one (1) tank installed in 1998, capacity: 1,200 gallons each.
- (h) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings including:
  - One (1) respray spray booth, equipped with one (1) hand-held pump spray gun with one (1) tip, installed in 1960, capacity: 1.3 gallons of oil per minute.
- (i) Three (3) rope openers, installed in 1955, completely enclosed (no emissions), capacity: 1,000 pounds of ropes per hour each (less than 1 pound per hour each) (326 IAC 6-3-2).
- (j) One (1) rope opener, installed in 1930, completely enclosed (no emissions), capacity: 1,000 pounds of ropes per hour (less than 1 pound per hour) (326 IAC 6-3-2).
- (k) One (1) conveyor belt, equipped with a water mist, installed in 1955, capacity: 3,000 pounds of hog hair fibers per hour (0.1 pounds of PM per hour).
- (l) One (1) scrap grinder, installed in 1992, capacity: 350 pounds of side trim and/or rejected mats per hour (less than 1 pound per hour) (326 IAC 6-3-2)

### Existing Approvals

All conditions from previous approvals were incorporated into this FESOP except the following:

FESOP F 091-6418-00059, issued May 28, 1997.

- (a) Condition D.1.1 that the amount of any single hazardous air pollutant (HAP) delivered to the applicators shall not exceed 0.75 tons per month and the amount of any combination of HAPs delivered to the applicators shall not exceed 2.00 tons per month. Therefore, the requirements of 326 IAC 2-7 do not apply.

Reason not incorporated: The single and combination of HAPs limits have been revised to less than 9.9 and 24.9 tons, respectively per twelve (12) consecutive month period, but still render the requirements of 326 IAC 2-7 not applicable.

- (b) Condition D.1.2 stated that the  $PM_{10}$  emissions from overspray shall not exceed 7.46 tons per month.

Reason not incorporated: The  $PM_{10}$  emission rate has been replaced by a limit of 8,950 tons of solids delivered to the applicators of the three (3) sprays booths per twelve (12) consecutive month period with a minimum transfer efficiency of ninety percent (90%) and a minimum water pan capture efficiency of ninety percent (90%). This limit is equivalent to  $PM_{10}$  emissions of less than 89.5 tons per year. This revised limit still renders the requirements of 326 IAC 2-7 not applicable.

- (c) Condition D.1.3 stated that the spraying operations shall comply with 326 IAC 6-3-2(c). The 326 IAC 6-3-2 equations are as follows:  $E = 4.10 P^{0.67}$ , where P equals process weight in tons per hour for process weights up to and including sixty thousand (60,000) pounds per hour and E equals the allowable emission rate in pounds per hour. For process weights in excess of sixty thousand (60,000) pounds per hour,  $E = 55.0 P^{0.11} - 40$ .

Reason not incorporated: The rule 326 IAC 6-3-2 was revised effective June 12, 2002 and now requires pursuant to 326 IAC 6-3-2(d) that the surface coating in the three (3) spray booths and respray area shall be controlled by a dry particulate filter, waterwash or an equivalent control device, and the control device shall be operated in accordance with manufacturer's specifications. The overspray pans comply with this revised rule.

- (d) Condition D.1.4 stated that daily visible emission notations of the spray booth stack and general ventilation exhausts, shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, 80 percent of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

Reason not incorporated: Pursuant to 326 IAC 6-3-2(d)(1), the surface coating spray operations shall be controlled by a dry particulate filter, waterwash or an equivalent control device, and the control device shall be operated in accordance with manufacturer's specifications and visibility emission notations of overspray are not required.

- (e) Condition D.2.1 stated that pursuant to 326 IAC 6-3 (Process Operations), the particulate matter emissions from the feeding, blending, cutting, and grinding operations shall not exceed 1.28 pounds per hour.

Reason not incorporated: The maximum process weight rate for any of the operations controlled by baghouse BH-1 is 3,300 pounds per hour. This process weight rate equates to an allowable PM emission rate not to exceed a total of 5.73 pounds per hour.

- (f) Condition D.2.2 stated that the PM<sub>10</sub> emissions from the feeding, blending, cutting, and grinding operations shall not exceed 0.372 tons per month.

Reason not incorporated: The monthly limit has been revised to an hourly PM<sub>10</sub> emission rate not to exceed 1.02 pounds per hour.

### Enforcement Issue

There are no enforcement actions pending.

### Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on August 27, 2001. Additional information was received on July 15, 2002.

There was no notice of completeness letter mailed to the source.

### Emission Calculations

See pages 1 through 5 of 5 of Appendix A of this document for detailed emissions calculations.

### Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/year)
PM	894.9
PM <sub>10</sub>	895.2
SO <sub>2</sub>	0.032
VOC	69.7
CO	4.50
NO <sub>x</sub>	5.36

Note: For the purpose of determining Title V applicability for particulates, PM<sub>10</sub>, not PM, is the regulated pollutant in consideration.

HAPs	Unrestricted Potential Emissions (tons/year)
Formaldehyde	4.59
Styrene	34.7
Vinyl Acetate	13.6
Vinyl Chloride	4.59
Butadiene	34.7
Benzene	0.0001
Dichlorobenzene	0.00006
Hexane	0.010
Toluene	0.0002
Lead Compounds	0.00003
Cadmium Compounds	0.00006
Chromium Compounds	0.00008
Manganese Compounds	0.00002
Nickel Compounds	0.0001
TOTAL	92.2

Note the potential to emit total HAPs exceeds the potential to emit VOC because the worst case HAP from each individual material in the surface coating operations has been added together.

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of  $PM_{10}$  is equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

#### Potential to Emit After Issuance

The source, issued a FESOP on May 28, 1997, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance

of the Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP, F 091-6418-00059; issued May 28, 1997.

	<b>Potential to Emit After Issuance</b> (tons/year)						
Process/emission unit	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Surface Coating Operations	89.5	89.5	-	69.4	-	-	Less Than 9.90 Total Less Than 24.9
Operations Equipped with Baghouse BH-1	4.46	4.46	-	-	-	-	-
Insignificant Activities Natural Gas Combustion	0.102	0.407	0.032	0.295	4.50	5.36	0.101
Other Insignificant Activity	5.0	5.0	-	0.5	-	-	negligible
Total PTE After Issuance	99.1	99.4	0.032	70.2	4.50	5.36	Single less than 10 Total less than 25

The PM and PM<sub>10</sub> emission limits for the surface coating operations have been set equal to the allowable PM<sub>10</sub> limit pursuant to 326 IAC 2-8-4 because all PM overspray is assumed to be PM<sub>10</sub>.

### County Attainment Status

The source is located in LaPorte County.

Pollutant	Status
PM <sub>10</sub>	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards.

LaPorte County has been designated as attainment or unclassifiable for ozone.

### **Federal Rule Applicability**

- (a) There are still no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.

The insignificant activity storage tanks are not subject to the requirements of NSPS Subpart K, Ka or Kb because all tanks regardless of installation date are less than forty (40) cubic meters in size.

- (b) There are still no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20, 40 CFR Part 61 and 40 CFR Part 63) applicable to this source.

### **State Rule Applicability - Entire Source**

#### **326 IAC 2-2 (Prevention of Significant Deterioration (PSD))**

This source, not 1 of the 28 listed source categories, constructed prior to the August 7, 1977 applicability date of the rule, was not subject to the PSD requirements of 326 IAC 2-2. This source continues to be a minor PSD source since the potential to emit all criteria pollutants is less than two hundred and fifty (250) tons per year based on the 326 IAC 2-8-4 limit for PM<sub>10</sub> and the equivalent limit for PM. There have been no major modifications of the source after August 7, 1977.

#### **326 IAC 2-6 (Emission Reporting)**

This source is located in LaPorte County and the Potential to Emit PM<sub>10</sub> and VOC is less than one hundred (100) tons per year. Therefore 326 IAC 2-6 does not apply.

#### **326 IAC 2-8-4 (FESOP)**

Pursuant to this rule, the amount of PM<sub>10</sub> shall be limited to less than one hundred (100) tons per year. In addition, the amount of a single HAP shall be limited to less than ten (10) tons per year and the combination of all HAPs shall be limited to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-7, do not apply.

#### **326 IAC 5-1 (Opacity Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR Part 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.



### State Rule Applicability - Individual Facilities

#### 326 IAC 6-3-2 (Particulate emission limitations, work practices, and control technologies)

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3(Process Operations). As of the date this permit is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirements from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirements until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

Pursuant to F 091-6418-00059, issued on May 28, 1997 and 40 CFR 52 Subpart P, the PM from the three (3) spray booths, known as Spray Booth #1 (topcoat), #2 (bottomcoat) and #3 (second topcoat) and the one (1) respray area shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Pursuant to 326 IAC 6-3-2(d), the surface coating in the three (3) spray booths and respray area shall be controlled by a dry particulate filter, waterwash or an equivalent control device, and the control device shall be operated in accordance with manufacturer's specifications. The overspray pans qualify as equivalent control devices and therefore, the three (3) spray booths and respray area comply with the requirements of 326 IAC 6-3-2(d).

#### 326 IAC 6-3-2 (Particulate emission limitations, work practices, and control technologies)

##### Operations Controlled By Baghouse BH-1

F 091-6418-00059, issued on May 28, 1997 and 40 CFR 52 Subpart P, the particulate matter (PM) from the four (4) feeders, one (1) bale opener, one (1) wigwag blending machine, and the one (1) lickerin assembly controlled by baghouse BH-1 with a maximum process weight rate of 3,300 pounds shall not exceed 5.73 pounds per hour. This allowable PM emission rate was calculated with the following equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Since this PM emission limit of 5.73 pounds per hour is greater than the aforementioned potential PM emission rate of 1.02 pounds per hour, the four (4) feeders, one (1) bale opener, one (1) wigwag blending machine, and the one (1) lickerin assembly controlled by baghouse BH-1 complies with this rule.

The baghouse BH-1 shall be in operation at all times these facilities are in operation, in order to comply with this limit.

#### 326 IAC 8-1-6 (New facilities; general reduction requirements)

Since the surface coating operations of Blocksom & Company has the potential to emit more than

twenty-five (25) tons per year of VOC, 326 IAC 8-1-6 could be applicable. As the source was prior to January 1, 1980, therefore, the source is exempt from the requirements of 326 IAC 8-1-6.

#### 326 IAC 8-6-1 (Organic Solvent Emission Limitations)

Since potential VOC emissions for this source are less than one hundred (100) tons per year, the source is not subject to the requirements of this rule.

### State Rule Applicability - Insignificant Activities

#### 326 IAC 6-3-2 (Particulate emission limitations, work practices, and control technologies)

F 091-6418-00059, issued on May 28, 1997 and 40 CFR 52 Subpart P, the particulate matter (PM) from the rope openers and scrap grinder shall not exceed 2.58 and 1.28 pounds per hour for process weight rates of 1,000 pounds per hour each for each rope opener and 350 pounds per hour for the scrap grinder. The allowable PM emission rates were calculated by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

### Testing Requirements

Although the only operation with more than forty (40%) of the potential to emit PM/PM<sub>10</sub> is the surface coating operation, where overspray is controlled by the water pans, PM and PM<sub>10</sub> stack testing of the baghouse BH-1 exhaust is proposed to verify compliance with 326 IAC 6-3-2 for PM and 326 IAC 2-8-4 for PM<sub>10</sub>. Testing has not been conducted on this baghouse during the last five (5) years. Note the PM and PM<sub>10</sub> control efficiencies of the baghouse have been stated as 99.5%.

### Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The following compliance requirements from previous approvals were incorporated into this FESOP. The compliance monitoring requirements applicable to this source are as follows:

- (a) Visible emissions notations of the baghouse BH-1 stack exhaust shall be performed during normal daylight operations once per shift. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
- (b) An inspection shall be performed within the last month of each calendar quarter of all bags controlling the four (4) feeders, one (1) bale opener, one (1) wigwag blending machine, and the one (1) lickerin assembly. All defective bags shall be replaced.
- (c) In the event that bag failure has been observed:
  - (1) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this proposed permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
  - (2) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this proposed permit (Section B - Emergency Provisions).

The following new compliance requirements were incorporated into this FESOP:

- (d) The Permittee shall record the total static pressure drop across the baghouse BH-1 used in conjunction with the four (4) feeders, one (1) bale opener, one (1) wigwag blending machine, and the one (1) lickerin assembly, at least once per shift when any of these facilities are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 2.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

These monitoring conditions are necessary because the baghouse BH-1 must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

The following compliance requirements from previous approvals were not incorporated into this FESOP:

Daily visible emission notations of the spray booth stack and general ventilation exhausts, shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, 80 percent of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

Reason not incorporated: Pursuant to 326 IAC 6-3-2(d)(1), the surface coating spray operations shall be controlled by a dry particulate filter, waterwash or an equivalent control device, and the control device shall be operated in accordance with manufacturer's specifications and visibility emission notations of overspray are not required.

## **Conclusion**

The operation of this stationary filter manufacturing source shall be subject to the conditions of the attached proposed FESOP No.: F 091-14808-00059.

**Appendix A: State Potential Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations**

**Company Name: Blocksom & Company**  
**Address City IN Zip: 405 East 5th Street, Michigan City, IN 46360**  
**FESOP Renewal: F 091-14808**  
**Plt ID: 091-00059**  
**Reviewer: Frank P. Castelli**  
**Date: August 27, 2001**

Material	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential tons per year	lb VOC /gal solids	Transfer Efficiency
<b>Three (3) Spray Booths (#1, #2 and #3)</b>																
XST	8.3	48.3%	48.3%	0.039%	48.3%	51.7%	0.02127	22000	0.01	0.00	1.51	36.35	6.63	878.83	0.01	90%
XXST-2	8.3	47.4%	47.4%	0.038%	47.4%	52.6%	0.02127	22000	0.01	0.00	1.48	35.42	6.46	894.16	0.01	90%
SFF-8	8.3	48.9%	48.8%	0.120%	48.8%	51.2%	0.02127	22000	0.02	0.01	4.66	111.86	20.41	868.95	0.02	90%
SFF-6	8.3	47.4%	47.4%	0.000%	47.4%	52.6%	0.02127	22000	0.00	0.00	0.00	0.00	0.00	894.80	0.00	90%
SPN-6	8.3	50.4%	50.0%	0.408%	50.0%	50.0%	0.02127	22000	0.07	0.03	15.85	380.31	69.41	843.63	0.07	90%
SED-92	8.3	48.6%	48.6%	0.040%	48.6%	51.4%	0.02127	22000	0.01	0.00	1.55	37.29	6.80	873.71	0.01	90%
SED-93	8.3	48.6%	48.5%	0.063%	48.5%	51.5%	0.02127	22000	0.01	0.01	2.45	58.72	10.72	875.02	0.01	90%
SED-94	8.3	48.8%	48.8%	0.000%	48.8%	51.2%	0.02127	22000	0.00	0.00	0.00	0.00	0.00	870.99	0.00	90%

**State Potential Emissions****Add worst case coating to all solvents****Worst Case:****TOTAL:**

Assume 90% of overspray captured by  
pans and recycled

<b>15.85</b>	<b>380.31</b>	<b>69.41</b>	<b>894.80</b>
		<b>After Capture</b>	<b>89.5</b>

## METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \* (8760 hrs/yr) \* (1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

**HAP Emission Calculations**

**Company Name:** Blocksom & Company  
**Plant Location:** 405 East 5th Street, Michigan City, IN 46360  
**FESOP Renewal:** F 091-14808  
**Plt ID:** 091-00059  
**Permit Reviewer:** Frank P. Castelli  
**Date:** August 27, 2001

Material	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Formaldehyde	Weight % Styrene	Weight % Vinyl acetate	Weight % Vinyl chloride	Weight % Butadiene	Formaldehyde Emissions (tons/yr)	Styrene Emissions (tons/yr)	Vinyl acetate Emissions (tons/yr)	Vinyl chloride Emissions (tons/yr)	Butadiene Emissions (tons/yr)
XST	8.3	0.02127	22000	0.000%	0.039%	0.00%	0.00%	0.00%	0.00	6.63	0.00	0.00	0.00
XXST-2	8.3	0.02127	22000	0.000%	0.038%	0.00%	0.00%	0.00%	0.00	6.46	0.00	0.00	0.00
SFF-8	8.3	0.02127	22000	0.003%	0.007%	0.08%	0.03%	0.00%	0.46	1.19	13.61	4.59	0.00
SFF-6	8.3	0.02127	22000	0.000%	0.000%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
SPN-6	8.3	0.02127	22000	0.000%	0.204%	0.00%	0.00%	0.204%	0.00	34.70	0.00	0.00	34.70
SED-92	8.3	0.02127	22000	0.000%	0.040%	0.00%	0.00%	0.00%	0.00	6.80	0.00	0.00	0.00
SED-93	8.3	0.02127	22000	0.027%	0.036%	0.00%	0.00%	0.00%	4.59	6.12	0.00	0.00	0.00
SED-94	8.3	0.02127	22000	0.000%	0.000%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00

Worst Case:

Total State Potential Emissions

<b>TOTALS:</b>	<b>(tons/yr):</b>	<b>4.59</b>	<b>34.70</b>	<b>13.61</b>	<b>4.59</b>	<b>34.70</b>
	<b>(lb/hr):</b>	<b>1.05</b>	<b>7.93</b>	<b>3.11</b>	<b>1.05</b>	<b>7.93</b>
	<b>(g/sec):</b>	<b>0.132</b>	<b>0.999</b>	<b>0.392</b>	<b>0.132</b>	<b>0.999</b>

**Total Worst Case HAPs            92.20    tons/yr**

**METHODOLOGY**

HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

**Appendix A: Emission Calculations  
Baghouse Operations**

**Company Name: Blocksom & Company**  
**Address City IN Zip: 405 East 5th Street, Michigan City, IN 46360**  
**FESOP Renewal: F 091-14808**  
**Plt ID: 091-00059**  
**Reviewer: Frank P. Castelli**  
**Date: August 27, 2001**

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	Emission Rate before Controls (lb/hr)	Emission Rate before Controls (tons/yr)	Emission Rate after Controls (lb/hr)	Emission Rate after Controls (tons/yr)
BH-1	99.5%	0.040	2970.0	203.7	892	1.02	4.46

**Methodology**

Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (sq. ft.) ((cub. ft./min.)/sq. ft.) (60 min/hr) (lb/7000 grains)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

**Allowable Rate of Emissions**

Process Rate (lbs/hr)	Process Weight Rate (tons/hr)	Allowable Emissions (lbs/hr)	
3,300	1.65	5.73	

**Methodology**

Allowable Emissions = 4.10(Process Weight Rate)<sup>0.67</sup>

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100**

**Page 4 of 5 TSD App A**

**Company Name: Blocksom & Company**  
**Plant Location: 405 East 5th Street, Michigan City, IN 46360**  
**FESOP Renewal: F 091-14808**  
**Pit ID: 091-00059**  
**Permit Reviewer: Frank P. Castelli**  
**Date: August 27, 2001**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

Oven #1 3.300  
Oven #2 1.500  
Mold Dryer #1 1.500  
Two Back-up Mold Dryers 3.000  
Drying Oven #3 2.025  
Total Space Heaters 0.907  
Sum 12.232

12.2323

107.15

Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.102	0.407	0.032	5.36	0.295	4.50

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

### Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.



**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100  
HAPs Emissions**

**Page 5 of 5 TSD App A**

**Company Name: Blocksom & Company**  
**Plant Location: 405 East 5th Street, Michigan City, IN 46360**  
**FESOP Renewal: F 091-14808**  
**Plt ID: 091-00059**  
**Permit Reviewer: Frank P. Castelli**  
**Date: August 27, 2001**

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.13E-04	6.43E-05	4.02E-03	9.64E-02	1.82E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total HAPs
Potential Emission in tons/yr	2.68E-05	5.89E-05	7.50E-05	2.04E-05	1.13E-04	<b>0.101</b>

Methodology is the same as page 4.

The five highest organic and metal HAPs emission factors are provided above.  
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.